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**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

GARRETT COLLICK, NOAH WILLIAMS,  
and NANCY WILLIAMS,

Plaintiffs,

vs.

WILLIAM PATERSON UNIVERSITY,  
KATHLEEN M. WALDRON, ROBERT  
FULLEMAN, ELLEN DESIMONE,  
WILLIAM PATERSON UNIVERSITY  
POLICE DEPARTMENT, JOHN DOES 1-20  
(names fictitious as presently unknown),  
employees, representatives, and/or agents of  
defendant WILLIAM PATERSON  
UNIVERSITY POLICE DEPARTMENT,  
JOHN DOES 1-20 (names fictitious as  
presently unknown), employees,  
representatives, and/or agents of defendant  
WILLIAM PATERSON UNIVERSITY  
POLICE DEPARTMENT, JOHN SMITH 1-5  
(names fictitious as presently unknown),  
employees, representatives, agents and/or  
spokespersons of defendant WILLIAM  
PATERSON UNIVERSITY, and JANE  
SMITH 1-5 (names fictitious as presently  
unknown), employees, representatives, agents,  
and/or spokes persons of defendant WILLIAM  
PATERSON UNIVERSITY,

Defendants.

Civil Action No.: 16-00471(KM)(JBC)

**NOTICE OF MOTION TO DISMISS  
PLAINTIFFS' COMPLAINT WITH  
PREJUDICE PURSUANT TO  
FED. R. CIV. P. 12(b)(6)**

**Electronically Filed**

**Return Date: June 30, 2016**

**Oral argument requested**

To: Michael J. Epstein, Esq.  
The Epstein Law Firm, P.A.  
340 West Passaic Street  
Rochelle Park, NJ 07662  
*Attorney for Plaintiffs*

**PLEASE TAKE NOTICE** that on June 20, 2016, or as soon thereafter as counsel may be heard, defendants William Paterson University, Kathleen M. Waldron, Robert Fulleman, Ellen DeSimone, and William Paterson University Police Department (collectively, “Defendants”), by and through their undersigned counsel, Chiesa Shahinian & Giantomasi PC, shall move before the United States District Court for the District of New Jersey, United States Post Office and Courthouse Building, Courtroom 4, Newark, New Jersey, the Honorable Kevin McNulty presiding, for entry of an Order dismissing the Complaint of plaintiffs Garrett Collick, Noah Williams, and Nancy Williams with prejudice for failure to state a claim upon which relief can be granted pursuant to Federal Rule of Civil Procedure 12(b)(6).

**PLEASE TAKE FURTHER NOTICE** that defendants shall rely on the accompanying Memorandum of Law and Declaration of Jeffrey S. Chiesa, Esq. with attachments in support of this motion. A proposed form of Order is also submitted for the Court’s consideration.

**PLEASE TAKE FURTHER NOTICE** that oral argument is requested.

**CHIESA SHAHINIAN & GIANTOMASI PC**

Dated: March 18, 2016

By: /s/ Jeffrey S. Chiesa  
Jeffrey S. Chiesa

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